

# Federal Defenders OF NEW YORK, INC.

Southern District  
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July 21, 2021


**BY EMAIL**

Honorable Lewis J. Lima  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**REQUEST GRANTED.**

The Court approves defendant's bail conditions to be modified to permit travel for work as proposed.

7/23/2021 SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

**Re: United States v. Jesus Alberto Brito Maldonado**  
**21 CR. 167 (LJL)**

Dear Judge Liman,

With the consent of the Pretrial Services Agency, I respectfully write on behalf of my client, Jesus Brito, to request that he be permitted to travel to the District of New Jersey for work, with permission from Pretrial. The Government takes no position on this request and defers to Pretrial.

On 2/12/2021, the following bail conditions were set for Mr. Brito by Judge Gorenstein: \$50,000 PRB; 3 FRP'S; Travel Limited to SDNY/EDNY; Surrender Travel Documents (family must turn in his US and Dominican Passport); Pretrial Supervision As Directed by PTS; Deft to Submit to Urinalysis, If Positive, Add Condition of Drug Testing/Treatment; Home Incarceration; Electronic Monitoring; Deft Not to Possess Firearm/Destructive Device/Other Weapon. His conditions were modified shortly after his release to allow him to go to the hospital for the birth of his first child. Mr. Brito has been fully compliant with his conditions of release. His conditions were further modified on April 29, 2021, to allow Mr. Brito to be placed on home detention, and July 16 to permit Mr. Brito's placement on a curfew enforced by electronic monitoring.

I request that Mr. Brito be permitted to travel to the District of New Jersey for work. Mr. Brito is a baseball coach and trainer. One of the teams that he coaches and trains has games in Newark, New Jersey. To allow him to work those games, I ask that Mr. Brito be permitted to travel to DNJ for work purposes with permission from Pretrial. As mentioned above, Mr. Brito's Pretrial Officer, John Moscato, consents to this request and the Government defers to Pretrial.

Respectfully submitted,  
/s/\_\_\_\_\_  
Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

cc: AUSA Jonathan Bodansky.